

# **EXHIBIT 66**

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
CHARLOTTESVILLE DIVISION

ELIZABETH SINES, SETH )  
WISPEL WEY, MARISSA )  
BLAIR, TYLER MAGILL, )  
APRIL MUNIZ HANNAH )  
PEARCE, MARCUS MARTIN, )  
NATALIE ROMERO, CHELSEA )  
ALVARADO, AND JOHN DOE, )

Plaintiffs, )

vs. )

JASON KESSLER, RICHARD )  
SPENCER, CHRISTOPHER )  
CANTWELL, JAMES ALEX )  
FIELDS, JR., VANGUARD )  
AMERICA, ANDREW ANGLIN, )  
MOONBASE HOLDINGS, LLC, )  
ROBERT "AZZMADOR" RAY, )  
NATHAN DAMIGO, ELLIOT )  
KLINE A/K/A ELI MOSLEY, )  
IDENTITY EVROPA, MATTHEW )  
HEIMBACH, MATTHEW PARROTT )  
A/K/A DAVID MATTHEW )  
PARROTT, TRADITIONALIST )  
WORKER PARTY, MICHAEL )  
HILL, MICHEL TUBBS, )  
LEAGUE OF THE SOUTH, JEFF )  
SCHOEP, NATIONAL SOCIALIST )  
MOVEMENT, NATIONAL FRONT, )  
AUGUSTUS SOL INVICTUS, )  
FRATERNAL ORDER OF THE )  
ALT-KNIGHTS, MICHAEL )  
"ENOCH" PEINOVICH, LOYAL )  
WHITE KNIGHTS OF THE )  
KU KLUX KLAN, AND EAST )  
COAST KNIGHTS OF THE )  
KU KLUX KLAN A/K/A )  
EAST COAST KNIGHTS OF THE )  
TRUE INVISIBLE EMPIRE, )

Defendants. )

CIVIL ACTION FILE

NO: 3:17-CV-00072-NKM

JAMES MICHAEL HILL

JUNE 18, 2020

VIDEOTAPED VIDEOCONFERENCE DEPOSITION OF  
JAMES MICHAEL HILL  
30(B)(6) CAPACITY FOR LEAGUE OF THE SOUTH  
KILLEN, ALABAMA  
THURSDAY, JUNE 18, 2020

(Reported Remotely)

REPORTED BY: TANYA L. VERHOVEN-PAGE,  
CCR-B-1790

JOB NO: 180542

June 18, 2020

8:28 a.m.

Videotaped Videoconference deposition of  
JAMES MICHAEL HILL IN A 30(B)(6) CAPACITY FOR  
LEAGUE OF THE SOUTH, held in Killen, Alabama  
before Tanya L. Verhoven-Page, Certified Court  
Reporter and Notary Public of the State of  
Alabama.

1 J.M. HILL

2 would exclude everybody. It would depend on their  
3 role in society, whether they were a positive or  
4 negative influence or whether they were hostile to  
5 the interests of the majority. So I could not say  
6 exclusively, for every single person. So --

7 Q But in all of your writings that you've  
8 published at the League of the South, you've  
9 described enemies of the League and southern and  
10 white nationalists to be blacks and Jews; isn't that  
11 right?

12 A State that -- state that -- make that  
13 statement again. I want to -- I want to make sure  
14 that I understand the --

15 Q In all of the writings that you've  
16 published at the League of the South, on the website  
17 for the League of the South, you've described the  
18 enemies of the League and enemies of southern, slash,  
19 white nationalists to be blacks and Jews; isn't that  
20 right?

21 A No, that's not right. I've written a lot  
22 of things that haven't mentioned our enemies, as you  
23 say, blacks or Jews or anyone else.

24 Q I'm asking you, Mr. Hill, whenever you  
25 have described the League of the South's enemies, you

1 J.M. HILL

2 (The last question was read back  
3 into the record.)

4 BY MR. LEVINE:

5 Q I think you can answer that yes or no,  
6 Mr. Hill.

7 A Give me a moment to consider this,  
8 please. It's a very broad question.

9 Yes, we have -- we have made it known  
10 that we would not welcome people who were enemies --  
11 open enemies to us, in our midst, because -- that's  
12 been part of our program from the very beginning, is  
13 to show southern whites that there would be an  
14 organization that would stand for their interests.

15 So yes, we have made it clear that our  
16 enemies are not welcome in our midst as long as they  
17 are our enemies. Now --

18 Q And Mr. Hill -- and Mr. Hill, in burning  
19 the Talmud, you are sending a message it all Jews,  
20 not some Jews; isn't that right?

21 A I don't know. I don't know all Jews,  
22 sir. I know that there are secular Jews and I know  
23 that there are religious Jews, so I don't know  
24 whether that would be correct or not.

25 Q And you also burned the Israeli flag; is

1 J.M. HILL

2 I didn't know anything much about it.

3 Q But Mr. [Redacted for PII] and Mr. [Redacted for PII] were  
4 authorized by you to participate in planning  
5 discussions for Unite the Right; isn't that right?

6 A I asked -- I asked Mr. [Redacted for PII]. I don't  
7 remember asking Mr. [Redacted for PII] one way or the other, but  
8 I did ask Mr. [Redacted for PII] if he would monitor what was  
9 going on on Discord and simply report to me what he  
10 found.

11 Q And you don't -- and did you also ask  
12 Mr. Tubbs to participate?

13 A No. To my knowledge, I did not ask  
14 Mr. Tubbs.

15 Q But you asked Mr. Tubbs -- you gave  
16 Mr. Tubbs assignments for Unite the Right; isn't that  
17 right?

18 A I don't recall, sir.

19 Q You don't recall giving Michael Tubbs the  
20 assignment of being the commander of operations for  
21 League of the South at Unite the Right?

22 A I misunderstood your question. I thought  
23 you were talking about something on Discord.

24 I did ask Mr. Tubbs if he would, as my  
25 chief of staff, assume responsibility for whatever

1 J.M. HILL

2 A That's correct, yes.

3 Q And is [Redacted for PII] the name that you use for  
4 the ProtonMail account?

5 A Yes, that's my ProtonMail e-mail address.

6 Q And that stands for League South  
7 president?

8 A League of the South president, exactly.

9 Q And what does Mr. Tubbs' e-mail address  
10 stand for?

11 A Well, it should be -- it should be [Redacted for PII].  
12 That's a mistake. I think he subsequently changed  
13 it. That should be [Redacted for PII], instead of [Redacted for PII].

14 Q What does it stand for, sir?

15 A I don't know what [Redacted for PII] stands for. You  
16 would have to ask Mr. Tubbs. Mine stands for [Redacted for PII],  
17 president.

18 Q And when did -- did the League of the  
19 South register e-mail accounts with ProtonMail as the  
20 server in 2018 or before 2018?

21 A Sir, I can't -- I can't remember when we  
22 did that.

23 Q Why did -- where is the ProtonMail server  
24 located? Where is that business located?

25 A I always understood it was in



1 J.M. HILL

2 Switzerland.

3 Q And what was the reason that League of  
4 the South decided to use a Swiss server business  
5 instead of a more familiar one like Gmail or Yahoo?

6 A Because of security reasons.

7 Q And I'm showing you -- what do you mean  
8 by security reasons?

9 A We found it would be more difficult for  
10 people to -- I guess -- and I'm -- to hack into our  
11 e-mails or to -- to discover our private  
12 conversations.

13 Q You wanted to maintain the secrecy of the  
14 League of the South communications to the fullest  
15 extent possible; is that right?

16 A We wanted to make sure our privacy was  
17 secure.

18 Q Are you -- are you familiar with any  
19 other e-mail addresses on ProtonMail of any other  
20 members of League of the South?

21 A Not right offhand. I don't -- no, I'm  
22 not.

23 Q How did you disseminate to League of the  
24 South members the fact that you were using  
25 ProtonMail?

1 J.M. HILL

2 Q But if you called him, how did you get  
3 his name and number? Who's the intermediary, sir?

4 A I don't -- I don't recall having an  
5 intermediary. And I'm not saying he didn't call me.  
6 I'm just saying I don't remember.

7 Q And what did Mr. Kessler say to you in  
8 that first conversation?

9 A To the best of my knowledge, sir, he  
10 asked me if I would agree to speak at the Unite -- he  
11 explained the Unite the Right rally to me, what it  
12 was all about, the reason for having it. He asked me  
13 if I would speak and if I would ask the League of the  
14 South members to come in support of the rally.

15 And I agreed to speak and to ask our  
16 people to attend.

17 Q What did he tell you was the purpose of  
18 the rally?

19 A The purpose of the rally was to defend  
20 the statue of Robert E. Lee, and that was then known  
21 as Lee Park in Charlottesville, because of threats by  
22 the City of Charlottesville to take the statue down.

23 Q Have you heard of the rally in May in  
24 Charlottesville regarding the same statue?

25 A I remember speaking of a rally that was

1 J.M. HILL

2 that were demonstrating. I don't know who had a  
3 permit or anything like that. I forget. But I know  
4 it turned into a serious brawl in Berkeley.

5 Q And it turned violent; isn't that right?

6 A Yes, absolutely it turned violent.

7 Q And you expected this rally to be like  
8 Battle of Berkeley; isn't that right?

9 A I didn't write this in this document that  
10 you're talking about.

11 Q I asked you first whether you expected.

12 A I expected the possibility of trouble  
13 because of what I had -- what I had seen prior to  
14 this.

15 Q And you knew that Mr. Kessler, since he  
16 had written this, also expected violence; is that  
17 right?

18 A I would assume that from what he wrote.

19 Q And your -- one of your objectives in  
20 going to Charlottesville was to show the left that  
21 they would not be opposed in a rally, correct?

22 A You kind of faded out on me. Please say  
23 that again.

24 Q One of your objectives, as described in  
25 this document, was to show the left that there was

1 J.M. HILL

2 of the words Jews Will Not Replace Us and Blood And  
3 Soil?

4 A Sir, the League of the South did not  
5 participate in that event on Friday night, August the  
6 11th. I don't know what their goal was. We were not  
7 there. We did not participate in it.

8 Q Mr. Hill, you didn't disavow the torch  
9 light rally on August 11th, did you?

10 A I didn't disavow it, I didn't support it.  
11 It happened.

12 Q You know members of League of the South  
13 attended the torch light rally, don't you?

14 A If they did, they attended on their own  
15 accord. They didn't attend officially as League of  
16 the South members because we had a meeting at our  
17 lodging that night to plan for the next day. So I --  
18 if they went, they went on their own accord, and I  
19 don't know who they are if they went. So --

20 Q You didn't decide not to participate in  
21 the torch light rally for tactical reasons. You  
22 decided not to participate because you had a group  
23 meeting regarding the next day; isn't that right?

24 A Yes, that's exactly right. We wanted to  
25 make sure that our plans for getting in and out of

1 J.M. HILL

2 Charlottesville safely were what they should be, and  
3 that's why we met the previous night and did not  
4 attend the torch light rally.

5 Q But you never -- you didn't drop out of  
6 the rally on August 12th because of the additional  
7 rally that was going to take place on August 11th,  
8 did you?

9 A I'm not sure I understand your question.

10 Q Well, you learned months beforehand that  
11 a torch rally was planned for August 11th; isn't that  
12 right?

13 A I don't recall when I learned that. I --  
14 I just can't -- I can't remember.

15 Q But it was before August 11th, right?

16 A I can't remember, sir. I don't know when  
17 I learned that there was going to be a torch light  
18 rally on August the 11th.

19 Q Isn't it a fact that you learned before  
20 August 11th that there was going to be a torch light  
21 rally?

22 A I don't remember.

23 Q Whenever you learned there was going to  
24 be a torch light rally, did you -- did you disavow  
25 it?

1 J.M. HILL

2 Q The LS is in attendance. Be cautious.

3 Do you see that?

4 A Yes: Thanks but this is not our game.

5 We are sending two observers.

6 Okay. I stand corrected. I simply  
7 forgot.

8 Q And doesn't the fact that Mr. [Redacted for PII]  
9 is sending you an e-mail that night identifying that  
10 torch light rally and time has been leaked --  
11 withdrawn.

12 First of all, Mr. [Redacted for PII] was a member  
13 of League of the South; is that correct?

14 A Yes, he was at the time.

15 Q And was he in attendance that weekend?

16 A No, he wasn't.

17 Q And was he -- this wasn't the first time,  
18 at 7:48 p.m., that you were learning of a torch light  
19 rally that was planned; isn't that right?

20 A Yes, I think that it was, as I said  
21 earlier, probably that afternoon, late afternoon,  
22 when I first heard of it, as best as I recollect.

23 Q You are really testifying under oath that  
24 you don't recall learning from any of the other  
25 League of the South members or from Mr. Kessler that

1 J.M. HILL

2 Q Thank you, Mr. Hill.

3 A Sure. Sorry about the technical  
4 confusion.

5 Q So I asked you earlier, besides -- I  
6 asked you earlier about your contacts with people not  
7 in League of the South regarding the plans for the  
8 Unite the Right rally. And you identified three  
9 people that you talked to, Jeff Schoep, Matt  
10 Heimbach, and Jason Kessler.

11 Is there anybody else that you talked to  
12 about participating in the events for the Unite the  
13 Right rally?

14 A At this point, I can't remember any. I'm  
15 not saying that there are not some I talked to, but I  
16 don't remember who they would be outside of the  
17 League. I know it was those three I talked to  
18 mainly.

19 Q And within the League, you were dealing  
20 with Ike [Redacted for PII] and with Michael Tubbs and with Brad  
21 [Redacted for PII], and who else did you say within the League?

22 A Our communications chief at the time was  
23 Pat [Redacted for PII], our logistics officer was J.C. [Redacted for PII].

24 Q Okay. Now, do you know a man by the name  
25 of David [Redacted for PII]?

1 J.M. HILL

2 Jeff Schoep. Upon his acceptance of the conditions  
3 you laid out last night, the planning of Operation  
4 Shoo Fly begins in earnest.

5 Do you see that?

6 A Yes, I see that.

7 Q And what conditions -- first of all, what  
8 was Operation Shoo Fly?

9 A That was our meeting all four of the  
10 groups that we've discussed under the Nationalist  
11 Front banner. That was our meeting on the outskirts  
12 of Charlottesville on Saturday morning, the 12th of  
13 August, our proceeding from there into the parking  
14 garage on East Market Street by the police  
15 department, and from there our march down to what at  
16 the time was known as Lee Park. That was -- that was  
17 it.

18 Q So you -- so just to be -- so I  
19 understand correctly.

20 When you saw the original operations  
21 manual, you testified that you were unhappy with the  
22 security arrangements and were going to make them for  
23 yourselves, correct?

24 A That is correct.

25 Q And when you proceeded to make them for



1 J.M. HILL

2 Q But you could have also found a different  
3 street to get into the park; isn't that right?

4 A No, sir, we could not have. Everything  
5 was so crowded, we could not know -- we were not from  
6 the area and this is the only route in we had  
7 planned. And, basically, the cops had everything  
8 else blocked off.

9 Q And so it's your testimony that the way  
10 you proceeded, unilaterally moving into the  
11 protesters with the shields, was an act of self  
12 defense for --

13 A It was an act of self defense for our  
14 liberty to exercise our First Amendment rights.

15 Q Now, were you carrying a gun that day?

16 A I was, sir. I was carrying a Glock 45.

17 Q And was there a discussion about the use  
18 of weapons on that day, before the events took place?

19 A There was a discussion on the previous  
20 night. We've already discussed the meeting we had on  
21 Friday night, the 11th. We went over the ground  
22 rules for everything that night. And that morning, I  
23 briefed everybody before we left our -- the place we  
24 stayed there, again, about not using any weapons at  
25 all, except in self defense of your own life or

1 J.M. HILL

2 A I don't think that there was one. I just  
3 --

4 Q Besides KKK?

5 A I saw this. As I said, when I got back  
6 from Charlottesville, I saw the video and the video  
7 looked -- looked, you know, very orderly and  
8 disciplined, and it just looked like a nice thing to  
9 do to bring people together and give your people a  
10 nice little event, exercise their First Amendment  
11 rights.

12 It didn't remind me of anything. I  
13 hadn't -- I hadn't seen anything like it before.

14 Q What time did you leave your campgrounds  
15 in Virginia on the morning of -- on Saturday morning?

16 A This would be a guess, but I am thinking  
17 somewhere between six and seven o'clock in the  
18 morning.

19 Q And where did you drive to?

20 A Well, I can't remember the exact name of  
21 the place, but I do think I can identify it by a  
22 couple of stores. I believe it was right outside of  
23 the city limits of Charlottesville. And we stayed --  
24 if my directions are right -- to the northwest of the  
25 city.

1 J.M. HILL

2 So we came -- we came down to a parking  
3 lot that had a Walmart and a JoAnne's Fabrics. I  
4 don't -- I can't name the place, but it was right  
5 outside, I believe, the city limits of  
6 Charlottesville. And that was the place that  
7 everyone was going to meet and we were going to form  
8 up a convoy and drive from there to the parking  
9 garage on East Market Street in Charlottesville.

10 Q And did you end up meeting at the top of  
11 the garage?

12 A I think people parked on all levels of  
13 the garage. I think -- as best I can remember, we  
14 parked on the top level because we wanted to go to  
15 the top and then let people behind us still in the  
16 bottom levels. So I think people parked on all  
17 levels of the parking garage.

18 Q But then I asked you, sir, did you end up  
19 meeting at the top of the garage?

20 A No, I actually -- I actually think that  
21 we met on the floor next to the top, to put our  
22 people in line and get them ordered up so we could go  
23 out and go down East Market Street to the park. So I  
24 think it was the floor below the top floor.

25 Q And did the group do anything else

1 J.M. HILL

2 left, is a younger fellow with a tan baseball cap,  
3 also with a League of the South emblem on his shirt,  
4 correct?

5 A Yes, I think that may be one of his sons.

6 Q And is it one of his sons, then, that  
7 pepper sprays this woman?

8 A I don't know. Let's --

9 Q Let's watch.

10 A Yeah, that's what I was going to say.

11 (Video Exhibit played.)

12 BY MR. LEVINE:

13 Q Did you just see that?

14 A I did.

15 Q It takes place at one minute on the tape.  
16 So would it -- that gentleman -- that League of the  
17 South person right there pepper sprayed that woman,  
18 correct?

19 A From the video, it certainly appears so.

20 Q And that's what you would call an act of  
21 self defense, I take it?

22 Did you hear my question, Mr. Hill?

23 A No, sir, I didn't. What was your  
24 question?

25 Q Would you consider that an act of self

1 J.M. HILL

2 defense?

3 A I personally would not consider that an  
4 act of self defense.

5 Q Now, after -- later in that afternoon --  
6 I'm going to show you Exhibit 31.

7 (Hill Deposition Exhibit No. 31 was  
8 marked for the record.)

9 BY MR. LEVINE:

10 Q Right here (indicating) it -- do you see  
11 Exhibit -- what we marked as exhibit 31, that's a  
12 tweet by you, correct?

13 A Yes, as far as I know. It's from my old  
14 Twitter account. I don't have access to it anymore,  
15 but I believe that's an accurate tweet.

16 Q And where were you when you tweeted this?  
17 This is at 2:25 p.m.

18 A Yeah, I was probably back at the place  
19 that we were staying, Seven Oaks, outside of the city  
20 of Charlottesville. And at the time I had Twitter on  
21 my phone so I could make tweets on my phone wherever  
22 I was. So --

23 Q So you recall that this tweet was when  
24 you were back at the -- at your lodging area?

25 A No, I don't know if I made it on the way

1 J.M. HILL

2 you want to, but we told our side of the story from  
3 our perspective.

4 Q Even -- even though you asked your men to  
5 go to battle in Charlottesville, you wanted to claim  
6 that all of the violence was in self defense; isn't  
7 that right?

8 A The violence that occurred there that day  
9 was so disparate, there were so many little  
10 incidents, sir, that I can't say what happened on  
11 every occasion, every confrontation. But I can tell  
12 you this, that, in general, we went in there and we  
13 defended ourselves, we defended our rights and I was  
14 very happy with the way that we did that.

15 Now, were there some incidences where a  
16 person in the heat of battle -- and that's what it  
17 was, sir. It developed into a battle there. You saw  
18 it, you've seen it on the video.

19 I can't account for what every single  
20 person did, but I can account for the organization in  
21 general, and I was very happy with the way things  
22 turned out for us. It was a tragic day, of course,  
23 but we got in and got out and, under the  
24 circumstances, to me, that was a very successful day.

25 I wish we could have spoken. I wish the

C E R T I F I C A T E

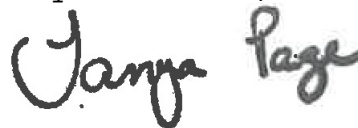
STATE OF ALABAMA:

JEFFERSON COUNTY:

I hereby certify that the foregoing deposition was reported, as stated in the caption, and the questions and answers thereto were reduced to written page under my direction, that the preceding pages represent a true and correct transcript of the evidence given by said witness.

I further certify that I am not of kin or counsel to the parties in the case, am not in the regular employ of counsel for any of said parties, nor am I in any way financially interested in the result of said case.

Dated this 24th day of June, 2020.



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Tanya L. Verhoven-Page,  
Certified Court Reporter,  
B-1790.